

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

In re:)	Case No. 16-40084-399
)	Chapter 13
Adam Keith Belmar,)	
Jennifer Lynn Belmar,)	
Debtors,)	
)	
Vantage Credit Union,)	
)	
Movant,)	Response Due: February 3, 2016
v.)	Hearing Date: February 10, 2016
)	Hearing Time: 10:00 am
Adam Keith Belmar,)	Location: Court Room 5 North
Jennifer Lynn Belmar,)	
Debtors,)	
)	
and)	
John V. LaBarge, Jr., Trustee,)	
Respondents.)	

NOTICE OF HEARING AND MOTION FOR RELIEF FROM AUTOMATIC STAY

PLEASE TAKE NOTICE that the undersigned will move before the Honorable Barry S. Schermer in the United States Bankruptcy Court, Thomas F. Eagleton Courthouse, 111 S. 10th Street, 5th Floor, North Courtroom, St. Louis, Missouri 63102 on **February 10, 2016 at 10:00 a.m.**, or as soon thereafter as counsel can be heard, for an order on the underlying motion for relief from automatic stay.

Any response must be filed with the Court by the 3rd day of February, 2016 and served upon the undersigned.

**FAILURE TO FILE A RESPONSE TO THE MOTION WITHIN SEVEN (7) DAYS
BEFORE HEARING DATE MAY RESULT IN A DEFAULT ORDER BEING
GRANTED.**

COMES NOW Vantage Credit Union (“Vantage”), by and through its attorneys, and moves the Court for relief on the following grounds:

1. On the date of the filing of this bankruptcy proceeding, Vantage was owed at least \$16,532.45, in unpaid principal, secured by a 2005 Chevrolet Silverado, VIN: 1GCHK23U95F847630.

2. Debtors entered into a retail installment contract on August 16, 2014. The lien was perfected on August 16, 2014, as evidenced by a notice of lien. See Exhibits A and B attached hereto and incorporated herein by reference.

3. The vehicle was worth at least \$17,575.00 at the time of filing.

4. Debtors have failed to provide adequate evidence of casualty insurance and Vantage is not able to verify coverage which adequately protects its collateral and its lienholder rights therein.

5. Cause exists for terminating the automatic stay, as Vantage is not adequately protected with its continuation.

6. Vantage requests that any order modifying the stay be effective immediately as allowed under Federal Bankruptcy Rule 4001(a)(3).

WHEREFORE, Vantage respectfully requests that the Court lift the automatic stay of 11 U.S.C. §362 as to the vehicle described above, that the vehicle be abandoned from the estate, that

any Order modifying the stay be effective immediately as allowed under Federal Bankruptcy Rule 4001(a)(3), and that the Court enter such further relief as is proper.

Respectfully submitted,
RIEZMAN BERGER, P.C.

By: /s/ Kathryn A. Klein
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Attorney for Vantage

CERTIFICATE OF SERVICE

A copy of the foregoing was served on the following parties via electronic means for those available and otherwise by postage prepaid, in the United States Mail, by first-class mail to the following on the 26th day of January, 2016:

Adam Keith Belmar
211 Webb Ln
Imperial, MO 63052
DEBTOR

John V. LaBarge, Jr.
P.O. Box 430908
St. Louis, MO 63143
CHAPTER 13 TRUSTEE

Jennifer Lynn Belmar
211 Webb Ln
Imperial, MO 63052
DEBTOR

Office of the United States Trustee
111 S. Tenth St., Ste. 6353
St. Louis, MO 63102

Sean C. Paul
8917 Gravois Road, 2nd Floor
St. Louis, MO 63123
ATTORNEY FOR DEBTORS

/s/ Kathryn A. Klein